

MKM:NS:LKG
F. #2018R01984

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii) and 1958(a))

BUSHAWN SHELTON,
also known as “Shelz,”

Case No. 18-MJ-956

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL ZOUFAL, being duly sworn, deposes and states that he is a
Special Agent with the Federal Bureau of Investigation, duly appointed according to law and
acting as such.

Between approximately March 1, 2018 and July 11, 2018, within the Eastern
District of New York and elsewhere, the defendant BUSHAWN SHELTON, also known as
“Shelz,” did knowingly and intentionally conspire to use and cause another to use one or
more facilities of interstate commerce, to wit: one or more cellular telephones, with intent
that one or more murders be committed in violation of New York Penal Law Section 125.25,
to wit: the murders of John Doe #1 and John Doe #2, individuals whose identities are known
to law enforcement, as consideration for the receipt of, and as consideration for a promise
and agreement to pay, something of pecuniary value.

(Title 18, United States Code, Section 1958(a))

Between approximately March 1, 2018 and July 11, 2018, within the Eastern District of New York and elsewhere, the defendant BUSHAWN SHELTON, also known as “Shelz,” did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence, to wit, a violation of Title 18, United States Code, Section 1958(a), and did knowingly and intentionally possess such firearms in furtherance of said crime of violence, one or more of which firearms was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii) and 2)

The source of your deponent’s information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have worked in this capacity for approximately two years. I am currently assigned to an FBI squad that investigates Balkan and Middle Eastern organized crime. During my tenure with the FBI, I have participated in organized crime investigations that have utilized, among other investigative techniques, physical surveillance, search warrants and debriefings of confidential sources and cooperating witnesses. Through my training, education and experience, I have become familiar with organized crime activities and efforts of persons involved in such activity to avoid detection by law enforcement. I am familiar with the facts and circumstances set forth below from my participation in the investigation, which includes, but is not limited to, my review of the investigative file, video surveillance and telephone

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

records, interviews with witnesses, conversations with other law enforcement officers involved in the investigation and law enforcement reports.

2. Between approximately September 2017 and October 2018, multiple acts of violence, some which are described in more detail below, have been committed against John Doe #1 and his son John Doe #2, individuals whose identities are known to law enforcement.

3. On or about November 26, 2017, in the Bronx, New York, a dark van pulled up next to and then in front of John Doe #1's vehicle, forcing John Doe #1 to stop. A masked individual wearing gloves exited the van and pointed a gun at John Doe #1. John Doe #1 drove away unharmed.

4. On or about December 27, 2017, three masked individuals, armed with a firearm, attacked John Doe #1 as John Doe #1 entered his residence in the Bronx, New York. Although there were no signs of forced entry, the men had gained entry to John Doe #1's secured residence prior to John Doe #1 returning home. John Doe #1 sustained multiple stab wounds to the neck and chest and a contusion to his head. John Doe #1 was also robbed of a sum of United States currency.

5. On or about April 16, 2018, an individual pointed a firearm at John Doe #2 in the vicinity of John Doe #2's residence in the Bronx, New York, and then fled in a vehicle.

6. On or about June 12, 2018, an individual pointed a firearm at John Doe #1 in the vicinity of John Doe #1's residence. John Doe #1, who also had a firearm, fired a shot at the individual, and the individual fled in a vehicle.

7. On or about July 11, 2018, at approximately 6:30 a.m., an individual exited the front passenger-side door of a red Nissan Altima that has been identified by law enforcement (the “Subject Vehicle”) and shot John Doe #2 multiple times as John Doe #2 exited his vehicle in the vicinity of John Doe #2’s residence. The shooter got back in the Subject Vehicle, again through the front passenger-side door, and the Subject Vehicle drove away. John Doe #2 sustained multiple gunshot wounds, which required John Doe #2 to undergo surgery.

8. On or about October 4, 2018, at approximately 4:45 p.m., an individual fatally shot John Doe #1 as John Doe #1 was in John Doe #1’s vehicle in a drive-through lane of a fast food restaurant in the Bronx, New York. The shooter fled the parking lot of the restaurant on foot and thereafter entered a waiting vehicle, which drove away. John Doe #1 sustained gunshot wounds to his head, neck and abdomen.

9. A cooperating witness (the “CW”)² has advised law enforcement that, in or about March or April 2018, BUSHAWN SHELTON, also known as “Shelz,” offered to pay the CW a sum of United States currency to kill John Doe #2. The CW agreed to do so and accepted SHELTON’s offer. SHELTON later informed the CW, in sum and substance and in part, that the purpose of killing John Doe #2 was to lure out John Doe #1, whereupon the CW would kill John Doe #1. SHELTON informed the CW that the sum paid to the CW would be increased if the CW succeeded in killing John Doe #1. The CW and SHELTON,

² The CW has pled guilty to, among other crimes, murder-for-hire conspiracy and unlawful use and possession of a firearm in the Eastern District of New York pursuant to a cooperation agreement. The CW is cooperating in the hopes of receiving leniency at sentencing. The CW’s information has been corroborated by physical evidence, telephone records, cell-site records, video surveillance and other evidence.

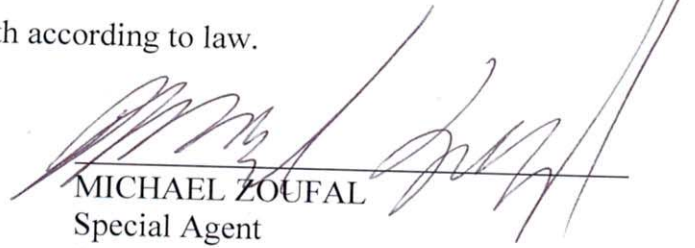
among others, communicated using cellular telephones in furtherance of this murder-for-hire plot, some of which calls were made to or from Brooklyn, New York. Additionally, at least one meeting in furtherance of this murder-for-hire plot, which the CW attended, took place in Brooklyn, New York.

10. At SHELTON's instruction, the CW went to locations associated with John Doe #1 and John Doe #2 on multiple occasions, at times accompanied by SHELTON, for the purpose of planning and executing the scheme to kill John Doe #1 and John Doe #2. SHELTON arranged for different drivers to accompany the CW on his visits to these locations and provided the CW with a firearm to be used in killing John Doe #1 and John Doe #2. On one such occasion, SHELTON provided the CW with a key and passcode to enter one of the locations.

11. Telephone records confirm that the CW and SHELTON were in communication via cellular telephones multiple times between approximately May 2018 and July 2018.


12. Additionally, license plate reader records place SHELTON's vehicle in the vicinity of John Doe #1's and John Doe #2's residences on at least 20 occasions between April 2018 and July 2018.

WHEREFORE, your deponent respectfully requests that the defendant
BUSHAWN SHELTON, be dealt with according to law.



MICHAEL ZOUFAL
Special Agent
Federal Bureau of Investigation

Sworn to before me this
10th day of October, 2018



THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK